

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

STATE OF TEXAS,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 5:13-CV-00255-C
)	
EQUAL EMPLOYMENT)	
OPPORTUNITY COMMISSION, <i>et al.</i> ,)	
)	
Defendants)	
_____)	

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, by and through their undersigned counsel, hereby move for a 45-day extension of time, until September 14, 2017, for the Parties to file their Cross-Motions for Summary Judgment. The Parties' Cross-Motions would otherwise be due on or before July 31, 2017. *See* Order, June 2, 2017, ECF No. 52. This is Defendants' first request for an extension of time to file the upcoming Cross Motions for Summary Judgment, and the requested extension is supported by good cause. In accordance with Local Rule 7.1(a), the undersigned counsel has consulted with counsel for Plaintiff, who represents that they do not oppose this Motion.

Defendants recently served discovery on Plaintiff, which is intended to elicit information that will be used in support of Defendants' Motion for Summary Judgment. The requested extension will allow sufficient time for Plaintiff to respond to this discovery and for Defendants to review those responses, conduct any follow-up discovery, and incorporate the resulting information into the Defendants' summary judgment briefing, as appropriate.

Additionally, counsel for Defendants will be on leave for part of the month of July and, with the press of business in other matters as well, they expect that maintaining the current

schedule will be difficult to accomplish in a regular fashion. Finally, counsel for Defendants expect to spend time consulting with their client agencies in order to adequately prepare the Motion for Summary Judgment, which will add to the time necessary to prepare the Motion. Given Plaintiff's claims and under these circumstances, a 45-day extension is reasonable and supported by good cause.

For the foregoing reasons, Defendants respectfully request that their unopposed Motion be granted and that the Parties be allowed until September 14, 2017 to file their Cross-Motions for Summary Judgment.

Dated: June 30, 2017

Respectfully submitted,

Counsel for Defendants:

CHAD A. READLER
Acting Assistant Attorney General

JOHN R. PARKER
United States Attorney

JOSHUA E. GARDNER
Assistant Director, Federal Programs Branch

/s/ James R. Powers
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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2017, I electronically filed the foregoing Motion for Extension of Time using the Court's CM/ECF system, causing a notice of filing to be served upon all counsel of record.

/s/ James R. Powers
JAMES R. POWERS